

Exhibit 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

JESSICA JONES, MICHELLE VELOTTA, and
CHRISTINA LORENZEN on Behalf of Themselves
and All Others Similarly Situated,

Plaintiffs,

v.

VARSITY BRANDS, LLC; VARSITY SPIRIT,
LLC; VARSITY SPIRIT FASHION & SUPPLIES,
LLC; U.S. ALL STAR FEDERATION, INC.; JEFF
WEBB; CHARLESBANK CAPITAL PARTNERS
LLC; and BAIN CAPITAL PRIVATE EQUITY;

Defendants.

Case No. 2:20-cv-02892-SHL-cgc

**DEFENDANT U.S. ALL STAR FEDERATION, INC. RESPONSES TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

COMES NOW Defendant U.S. All Star Federation, Inc. ("USASF"), pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and the Local Civil Rules of the United States District Court ("Local Rules"), and responds to the First Set of Interrogatories propounded by Plaintiffs as follows:

OBJECTIONS TO DEFINITIONS

1. USASF objects to the definitions of "document" and "documents." The parties have negotiated the meaning of the term "document" for discovery purposes in this litigation as set forth in the parties' Joint Stipulated Protocol for the Discovery of Electronically-Stored Information and Hard Copy Documents (the "Agreed ESI Protocol"). USASF will follow the definition in the parties' Agreed ESI Protocol and disregard the definition in Plaintiffs' First Set of Interrogatories.

2. USASF objects to the term “employee” in that it defines the term in an unnatural way to include non-employees. Where the term employee appears in the requests, USASF will interpret that term to cover actual employees of USASF.

3. USASF objects to the terms “You” or “Your” to the extent they seek to include any person or entity beyond USASF. Where “You” or “Your” appears in the requests, USASF will interpret the terms to cover USASF.

OBJECTIONS TO INSTRUCTIONS

1. USASF objects to the Instructions to the extent Plaintiffs seek to impose obligations beyond those required by the Federal Rules of Civil Procedure. USASF will respond in accordance with the Federal Rules of Civil Procedure and will otherwise disregard the Instructions.

2. USASF objects to the time period contained in Instruction 7 and the embedded definition of “Relevant Time Period.” Any request for information for the more than 12 year period specified by Instruction 7 would be overly broad, unduly burdensome, and disproportional to the needs of the case, and inconsistent with the Court’s previous rulings in this matter. To the extent USASF responds to the interrogatories, USASF will only do so for the period January 1, 2015 to June 30, 2020.

INTERROGATORIES

The above objections are explicitly incorporated by reference to each of the following responses as if they were set forth in full in each individual response.

INTERROGATORY NO. 1: State each affirmative defense to the claims against You.

RESPONSE: USASF objects to this Interrogatory as premature as it seeks information that USASF is not required to provide prior to filing an answer in this case. USASF further objects to this Interrogatory to the extent that it seeks information protected from disclosure by the

attorney-client privilege and work product doctrine. Subject to and without waiving any of the foregoing objections, USASF will identify any affirmative defenses when an answer is required under the Federal Rules of Civil Procedure.

INTERROGATORY NO. 2: State each fact which supports each affirmative defense stated in response to Interrogatory No. 1.

RESPONSE: USASF objects to this Interrogatory as premature as it seeks information that USASF is not required to provide prior to filing an answer in this case. USASF further objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and work product doctrine. Moreover, USASF objects to this Interrogatory on the basis that it contains multiple subparts, one for each affirmative defense that USASF will ultimately assert. Based on the Second Set of Interrogatories already served by Plaintiffs, Plaintiffs are far in excess of the twenty-five interrogatory limit set forth in Rule 33 of the Federal Rules of Civil Procedure. Subject to and without waiving the foregoing objections, USASF will identify the facts supporting its affirmative defenses when and to the extent it is required to do so under the Federal Rules of Civil Procedure.

VERIFICATION

I, being first duly sworn, state that I am a duly authorized representative to execute this verification, and that I have read the foregoing Responses To Plaintiffs' First Set Of Interrogatories to USASF ("Interrogatory Responses"); that the Interrogatory Responses were put together with the assistance of counsel; that the Interrogatory Responses are based on information and belief, relying upon the investigation of records or other information believed to be correct, and are therefore subject to inadvertent or undiscovered errors, are based on and necessarily limited by the records and information still in existence, presently recollected, and discovered to date in the course of preparation of these Interrogatory Responses; and that subject to the above limitations, the Interrogatory Responses are true to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

This, the 4th day of April, 2022.

Kathy Curree

April 4, 2022

Respectfully submitted,

/s/ Nicole D. Berkowitz

Grady Garrison (TN #008097)

Nicole D. Berkowitz (TN #35046)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 4, 2022, a true and correct copy of the foregoing was forwarded via the Court's ECF system and/or by email to all counsel of record.

/s/ Nicole D. Berkowitz